

# Milbank

**ADAM FEE**

*Partner*

55 Hudson Yards | New York, NY 10001-2163

T: 212.530.5101

afee@milbank.com | milbank.com

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## VIA ECF

The Hon. Edgardo Ramos  
U.S. District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: SEC v. Honig, et al., 18 Civ. 8175 (ER)

Dear Judge Ramos:

We represent defendants John Stetson, HS Contrarian Investments, LLC, and Stetson Capital Investments Inc., in the above-referenced matter. On May 7, 2019, the parties agreed to file separate letters setting out their respective proposed discovery plans.

We respectfully submit that the Court should adopt the discovery plan filed by Co-Defendant Robert Ladd on May 7, 2019 (*see* Dkt. 119), except as to the date for the commencement of document production. With respect to that date alone, we ask that the Court adopt the SEC's position in paragraph 6 of its proposed discovery plan (*see* Dkt. 121), which provides that the first request for production of documents shall be served no earlier than July 23, 2019, after the contemplated motions to dismiss are fully briefed.

Respectfully submitted,

/s/ Adam Fee

Adam Fee

George S. Canellos

cc: All counsel of record (via ECF)